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From: Worstell, Aaron
Sent: Thur 9/19/2013 8:41:07 PM
Subject: RE: State N3 Language

Laurel- At any time, did we receive Pacificorp's permit application for Naughton nat gas conversion or the WYDEQ's modeling? I'm trying to follow up on the visibility benefits of switching to natural gas, but strangely enough can't find anything in the record or elsewhere.

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What is wanted is not the will to believe, but the wish to find out, which is the exact opposite. -Bertrand Russell

From: Dygowski, Laurel
Sent: Thursday, September 19, 2013 1:55 PM
To: Daly, Carl; Laumann, Sara; Odendahl, Steve; Morales, Monica; Worstell, Aaron
Subject: State N3 Language

EPA requested additional information on the conversion of Naughton Unit 3 from

a coal fired unit to a natural gas fired unit. 78 FR 34760. EPA must evaluate PacifiCorp's fuel conversion in accordance with Appendix Y as a "better-than-BART" alternative and not as a

BART control technology option because EPA had made clear in its BART Guidance that "it is not [EPA's] intent to direct States to switch fuel forms, *e.g.* from coal to gas," as part of the BART analysis. 70 FR 39104, 39164.

PacifiCorp submitted to the State a voluntary application for the conversion of the unit to a natural gas one. 78 FR 34760. The State performed a New Source Review analysis of the application and published the analysis for comment on May 16, 2013. In accordance with the Wyoming Air Quality Standards and Regulations, the State afforded the public thirty days to submit comments on the application and analysis. After responding to each comment, the State issued Air Quality permit MD-14506 to PacifiCorp on July 5, 2013. While PacifiCorp voluntarily submitted its permit application to convert Naught Unit 3 to natural gas, the State issued a federally enforceable permit requiring such conversion. Compliance with the permit is therefore not voluntary.

The permitted NO_x performance level of Naughton Unit 3 after conversion to natural gas is 0.08 lb/MMBtu based on a 30-day rolling average and not 0.10 lb/MMBtu based on a 30-day rolling average as stated in PacifiCorp's permit application. Additionally, the permitted NO_x mass emission rate is 250 lb/hr based on a 30-day rolling average, which is protective of visibility and lower than the BART-determined NO_x rate of 259 lb/hr based on the same averaging period. Finally, annual NO_x emissions will be reduced from the BART level of 1,134 tons to 519 tons.

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